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REMARKS

Claims 1-27 are currently pending in the subject application and are presently under consideration. Claim 1 has been amended solely for purposes of clarification. Additionally, the specification has been amended to correct a typographical error. A complete listing of the claims is provided in revised amendment format at pages 2-6, while the specification amendment can be found at page 7. Favorable reconsideration of the subject patent application and entry of the claim amendment is respectfully requested in view of the following comments.

I. Rejection of Claims 1-27 Under 35 U.S.C. §102(e)

Claims 1-27 stand rejected under 35 U.S.C. §102(e) as being anticipated by Tjandrasuwita (U.S. Patent No. 6,198,469). Withdrawal of this rejection is requested for at least the following reasons.

Tjandrasuwita fails to disclose, teach or suggest all the claim limitations of independent claims 1, 15 and 22. Specifically, Tjandrasuwita does not disclose a grayscale generator programmable to generate grayscale formatted data *according to a selected display mode* as recited by claims 1 and 22. Tjandrasuwita merely discloses grayscale logic 301 for STN module 207 not for TFT module 206. Applicants' representative asserts that the Examiner improperly infers that both the STN module 207 and the TFT module 206 have grayscale logic 301.

A claim is anticipated only if *each and every element* as set forth in the claim is found, *either expressly or inherently* described in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987) (emphasis added). The identical invention must be shown in as complete detail as is contained in the ... claim. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Inherency, however, may not be established by probabilities or possibilities. The mere fact that a certain thing may result from a given set of circumstances is not sufficient. *Mehl/Biophile Int'l Corp. v. Milgraum*, 192 F.3d 1362, 1365, 52 USPQ2d 1303, 1305 (Fed. Cir. 1999), reh'g denied, 1999 U.S. App. LEXIS 31386 (Fed. Cir. Oct. 27, 1999) (quoting *In re Oelrich*, 666 F.2d 578, 581, 212 USPQ 323, 326 (CCPA 1981)) (emphasis added).

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As gray scale logic is not expressly described with respect to the TFT module 206, applicants' representative assumes that the Examiner believes that said element is inherent from the fact that the two are modules are drawn in parallel and are mutually exclusive. However, such a statement is pure speculation on the part of the Examiner, especially since Tjandrasuwita is specifically directed toward producing gray scale shading for STN displays (See Title, col. 1, lines 9-13, col. 2, lines 26-35, and col. 4, lines 5-18). While Tjandrasuwita does disclose that data can be formatted for either TFT mode or STN mode, the reference does not disclose, teach, or suggest either expressly or inherently employing grayscale logic 301 with respect to both TFT and STN modes. The mere fact that such functionality may be possible is not sufficient to establish the anticipation of independent claims 1, 15, and 22 under § 102. Additionally, a person of ordinary skill in the art would not be motivated, without consulting the applicants' specification, to modify Tjandrasuwita to produce the subject invention as claimed at least in part because Tjandrasuwita fails to teach or suggest the desirability of producing a single raster engine capable of providing grayscale data to one of a plurality of disparate display types, formats, or *modes* (e.g., CRT, LCD, TFT, STN). Accordingly, the rejection of claims 1 and 22 (as well as claims 2-14 and 23-27 depending, respectively, thereon) should be withdrawn for at least this reason.

Furthermore, Tjandrasuwita does not disclose a raster engine providing selected pixel data at a parallel output according to a *selected display mode*, as recited by independent claims 1 and 22. As disclosed in the specification, the subject raster engine is programmable to support many different and disparate display types (e.g., display modes) over the same interface (See page 9, lines 3-5, and Fig. 31). Accordingly, the engine can support analog CRTs, analog LCDs, as well as digital LCDs. Conventional raster engines and video controllers require manual rerouting of signal connections to interface different display formats, whereas the present invention provides for universal connectivity (See page 9, lines 23-26). Although, Tjandrasuwita does provide support for both LCDs and CRTs, it does so in a conventional manner. As shown in figure 1, Tjandrasuwita provides separate outputs from the computer system for a CRT and an LCD wherein the LCD output is routed through a separate flat-panel interface. Therefore, Tjandrasuwita does not anticipate claims 1 and 22 at least because Tjandrasuwita does not disclose providing selected pixel data at a parallel output according to a selected display mode as recited by the claims. Accordingly, claims 1 and 22 (as well as claims 2-14 and 23-27 depending, respectively, therefrom) are allowable and withdrawal of their rejection is

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respectfully requested.

Finally, as per claim 15, Tjandrasuwita fails to disclose teach or suggest a *grayscale lookup table control register* programmable by a computer system. The only mention, in Tjandrasuwita, of a control register is with respect to a select signal for selecting either a color or monochrome display. Accordingly, independent claim 15 is allowable, because Tjandrasuwita fails to disclose, teach, or suggest each and every element of the claim. Claims 16-21 depend from allowable claim 15. Therefore, the rejection of claims 15-21 should be withdrawn for at least this reason.

In view of the aforementioned, claims 1, 15, and 22 (as well as claims 2-14, 16-21, and 23-27 depending, respectively, therefrom) are allowable and their allowance is respectfully requested.

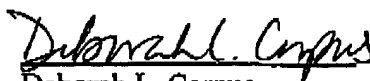
II. Conclusion

The present application is believed to be condition for allowance in view of the above amendments and comments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,
AMIN & TUROCY, LLP


Deborah L. Corpus
Reg. No. 47,753

AMIN & TUROCY, LLP
24TH Floor, National City Center
1900 E. 9TH Street
Cleveland, Ohio 44114
Telephone: (216) 696-8730
Facsimile: (216) 696-8731